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August 26, 2024

VIA CM/ECF ELECTRONIC FILING

Hon. John P. Cronan, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Honeedew Investing LLC vs. Jose Abadi*
Case No. 19-08951-JPC-VF
Memo Endorsement to Status Report August 7, 2024 [Dkt. 97]
Updated Report

Dear Judge Cronan:

The undersigned represents Plaintiff Honeedew Investing LLC (“Honeedew” or “Plaintiff”) in the above-referenced matter. Pursuant to Your Honor’s Memo Endorsed Order of August 7, 2024 of [Dkt. 97] (“Order”), below please find a status report for Your Honor’s consideration.

Since Plaintiff’s submission of its prior status letter of August 5, 2024 [Dkt. 96], Plaintiff through its Argentina counsel obtained further information concerning service of substitution pleadings upon Ivonne Abadi, Miguel Claudio Abadi, and Francia Luisa Guthmann and made further inquiry to the relevant authorities. Plaintiff is informed that by September 17, 2024, the Argentine Central Authority¹ will have completed all steps towards notification, including transmittal of digitized records of the substitution pleadings available through the relevant Argentina court: Juzgado Nacional de 1^a. Instancia en lo Civil N° 11 Expediente CIV 002114/2024 (“Argentina Court”). Accordingly, Plaintiff seeks until September 17, 2024, or such sooner date if it is so informed of completion, to move for judgment by default.

Plaintiff has learned the Central Authority assigned the following reference to the substitution pleadings: COPMC-NOR-HCCH-NOT-CARPE 2988/2019-HONEEDEW INVESTING LLC C/ JOSE ABADI S/DAMAGES"(File No. 1:19-CV-08951-JPC)-EE. USA (“Argentine Case

¹ A unit of the Argentine Foreign Ministry.

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Number") which has been moved to the Argentine Court for delivery. Plaintiff is further informed the Central Authority has already or will (imminently) digitize the same so as to be available through the Argentine Court electronically as well.² Following digitization, service will be completed a few days afterwards. Plaintiff's counsel in Argentina was informed of the foregoing on August 22, 2024, by a call from the office of the Secretary of the Central Authority that the attorney assigned would be notified and that service would be completed.

Plaintiff anticipates having to domesticate a default judgment of this Court in the nation of Argentina in this matter and thus asserts, notwithstanding that service is complete in accordance the Federal Rules and the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters, that the brief window of time for completion of the process by the Argentine Court will reduce or eliminate the need for extenuated proceedings in Argentina upon commencement of exequatur proceedings there. Accordingly, Plaintiff seeks until September 17, 2024 to move for default judgment, or such earlier time should Plaintiff learn that service is completed sooner by the Argentine Court.

Thank you in advance for Your Honor's Consideration.

Respectfully submitted,

/s/ Eric S. Medina

Eric S. Medina, Esq.

² A process I am informed may only be completed by the Central Authority.